PROGRAM PLANNING AND DEVELOPMENT

Commissioners Memo

Vermont Commissioner of Education Richard P. Mills (1994) states, "Each district is required (under Title VI of the Civil Rights Act of 1964) to have policies and procedures in place, that show how the school district will meet the needs of limited English proficient students. The district must be able to demonstrate that the method of instruction utilized gives limited English proficient students a meaningful opportunity to participate in and benefit from educational programming at school. This includes taking affirmative steps to enable students to overcome language barriers. Policies and procedures are required whether or not the school district currently has students needing these services."

Nationwide, the most effective programs for the education of ESL students have the support of district-level administrators. This support enables district personnel to address the need for educational policy and systematic procedures, qualified staff, instructional materials, coordination of programs, staff training and technical assistance. The administration should seek input from school personnel, students, parents, and community members in the efforts to develop high quality services for ESL students.

ESL Coordination Team(s)

Depending on how many schools in the district have ESL enrollments, the Language and Cultural Affairs Program (LCAP) recommends that districts organize either a system-wide team and/or school-based team(s) for planning of legally required services. Although the team(s) will carry out a number of important tasks related to programmatic decision-making, their first priority should be to develop a written policy and procedures for serving ESL students in the district.

Ideally, system-wide and/or school-based teams will include teachers, administrators, and other school staff who work directly with ESL students in the district's schools. In forming a team(s), districts might first survey their staff to identify persons with previous experience, training and a commitment to this population of students.

In districts with ESL Program Coordinators, one of their responsibilities would be to oversee the team(s) involved in the development of a policy and procedures. The coordinator also consults with and informs the Superintendent of programmatic issues and decisions.

Other general functions of the district ESL Coordination Team are:

♦   to oversee the implementation of the district's policy and procedures for serving ESL students and revise as needed;

♦   to support the collaboration and training of ESL teachers and mainstream school staff;

♦   to periodically evaluate the district program services for ESL students and revise, as needed.

Adapted from Parker, R.C. (1993). Roles and Responsibilities of the System-wide ESL Coordination Team. *A Program Process Guide* (pp. 77-80). Providence, RI: New England MRC.

First Steps

Some districts in the state with larger numbers of ESL students may have already developed a policy and procedures. In such districts, the system-wide or school-based team(s) should review these carefully to make sure that they meet federal and state law and policy guidelines.

Districts that do not yet have a policy and procedures for serving ESL students in their districts or simply want to enhance the quality of their program, may choose to seek technical assistance and training prior to writing a policy and procedures. See Resources for Language Development Programs, Appendix H, p. 160.

Team members will benefit from reserving time to become better informed about issues regarding the education of ESL students in public schools. They need to understand second language acquisition, acculturation, educational issues of ESL students, and legal and program responsibilities. This is all important background information for writing policy and procedures. Although an initial study period will take time, the payoff will come in having well thought-out, comprehensive services.

Another recommendation during this programmatic decision-making stage is for the team to conduct a district needs assessment and an inventory of current resources for serving ESL students. The first task would be to determine the number of schools involved; the language and cultural groups represented; literacy levels; prior experience of teachers and school personnel in working with ESL students. This enables the team to identify areas of program need--e.g., qualified staff, training, instructional and curricular materials, funding, assessment materials, cultural background information, etc.--in terms of language development, content area instruction, acculturation and counseling services, vocational, health/special needs, and adjunct services.

For background information that would help in conducting the needs assessment and inventory, see *TESOL's Standards for Ensuring Access To Quality Educational Experiences for Language Minority Students,* Appendix C, p. 42 and *TESOL Statements on the Education of K-12 Language Minority Students & Preparation of Primary and Secondary Teachers in the United States,* Appendix C, p. 44. These standards serve as a tool for districts to use in planning programs for ESL students in public schools in the U.S. A question format helps districts to judge how well they provide ESL students with access to: a positive learning environment; appropriate curriculum; full delivery of services; and equitable assessment.

Development of a Policy and Procedures

Ideally, the information gathered from the needs assessment/inventory will be used to develop a *written policy and procedures for serving ESL students* in the district. Written policies and procedures serve as a blueprint for a quality program. They describe the district's approach, how it will meet requirements for legal compliance, and how the program will be implemented and coordinated at the school level.   The person(s) responsible for program coordination, supervision and evaluation of relevant school staff serving ESL students should be designated. The procedures also delineate roles and responsibilities for people carrying out various tasks.

The **written policy** *should briefly summarize the district's goals and procedures in the following areas:*

- **program rationale**--description of current needs & specific goals for helping ESL students gain access to quality educational experiences;

- **procedures to identify and screen** students with limited English proficiency;

- **ways it will communicate with and involve parents** who may need special accommodations due to language and cultural differences;

- **initial assessment** of English language proficiency, native language proficiency, and academic skills for purposes of classification and instructional placement;

- **instructional placement procedures** for students needing language assistance and academic support programs;

- ***provision of "appropriate services" including an alternative language program, content area instruction, acculturation and counseling services, vocational instruction (if desired), health/special needs, and adjunct support services**--*description of program design, teacher qualifications, instructional approaches, curriculum, time allotment, materials, classroom space, resources, record keeping;

- ***multiple criteria for monitoring of English language development while in program and for exit*** from language assistance and academic support program;

- ***monitoring of academic performance*** after exit from program;

- ***evaluation of the district's program for ESL students***.

For guides to use in writing a district ESL Policy and Procedures, see Chapter 4. Additional materials for development of policies and procedures can be found in Robert Parker's *A Program Process Guide*--Part 2 of the Training Module: *Developing Appropriate Educational Programs for Low-Incidence Numbers of LEP Students* (1993).

Implementation of Policy and Procedures at School Level

Once a district has worked out a policy and procedures, the next step is to find a satisfactory way to implement them in the schools. Because providing an effective program for ESL students is a *collective responsibility*, the LCAP recommends **school-based ESL Coordination Teams** be formed to carry out specific tasks outlined in the written policy and to make decisions about services for individual ESL students.

The team approach aims to prevent any single person from being overburdened. It uses the varied talents and experiences of staff, parents or community members. The ultimate goal of the team is to help ESL students integrate successfully into the social and academic activities of the school. Therefore, the teams should represent the whole range of school personnel involved in the education of ESL students.

A typical team might include: a classroom or content area teacher(s); an ESL teacher; a building administrator; a guidance counselor; and other specialists, as appropriate. In addition, the team could involve parents, agency staff and community members (with knowledge of students' specific languages, cultures, and experiential backgrounds) on an ad hoc basis. Ideally, team members value the linguistic/cultural backgrounds that their students bring and want to incorporate these into the social and academic life of their schools. Those people who have experienced learning another language and adjusting to a new culture may bring valuable insights to the team.

School-based ESL Coordination Teams should meet at least quarterly to make decisions about services for ESL students.[4] Teachers and other school staff may feel overburdened with meetings, but most also realize that team planning can be more efficient in the long run. Many schools already have established teams, which meet regularly to discuss students' progress and make decisions about programming for individual students.

Districts with smaller numbers of ESL students may prefer to delegate responsibility for planning and decision-making about ESL students' programs to existing teams. This will work if members are willing to get relevant training and take on this additional responsibility. Districts with larger numbers of ESL students may prefer to form separate on-site ESL Coordination Teams which focus only on ESL services.

Whichever approach is taken, communication and coordination between the ESL teacher(s) and others directly involved with ESL students in the school is vital. On-site teams provide an opportunity for them to share language and content objectives, teaching and assessment strategies, instructional resources, student observations, and communication with families. When there is little or no communication between ESL teachers and other school personnel, ESL student programs become fragmented and isolated (Parker, 1993). All team members share responsibility for seeing that district ESL policy and procedures are implemented consistently in their school.

The entire school community of administrative, teaching, and support staff can play a role in empowering ESL students to acquire English language skills and adapt to the culture.

Monitoring of District Policies and Procedures

Although Vermont's Education Goals do not explicitly address the needs of ESL students, they do state that "*every* child becomes a competent, caring, productive, responsible individual and citizen who is committed to continued learning throughout life." If ESL students are to gain the essential knowledge and skills identified in Vermont's Education Goals, *all school districts* will need to be committed to seeing that they receive equal educational opportunities.

According to Commissioner Mills' (1994), the State Department of Education will begin monitoring school districts for compliance with ESL and Title VI requirements three months from the date this handbook is made available. The *English as a Second Language (ESL) Policy and Procedures Checklist*, Appendix C, p. 45, can be used as a guideline for reviewing the district ESL policy and procedures.

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[4]ESL teachers, classroom teachers and other school personnel should communicate on a more frequent basis about the daily instructional needs of their LEP students.

Anyone with questions about district policies and procedures should first contact: Karen Richards, Attorney and Civil Rights Enforcement Officer for the State Department of Education. Her role is to make recommendations concerning compliance issues and to investigate complaints.

Appendix C
TESOL Standards: Ensuring Access to Quality Education
for Language Minority Students (9/92)

Language minority students are those students who learned a language other than English as their first language. These students may be immigrants, refugees, or native born Americans. They may come to school with extensive formal education or they may be academically delayed or illiterate in their first language. Such students arrive at school with varying degrees of English proficiency. Some may not speak English at all; others may speak English, but need assistance in reading or writing English.

Whatever the case, it is clear that schools that hope to help these students meet the National Education Goals must provide special assistance to them. While the type of special assistance may vary from one district or school to another, all special assistance programs must give language minority students full access to the learning environment, the curriculum, special services and assessment in a meaningful way.

Teachers of English to Speakers of Other Languages (TESOL) offers the following standards of access to help schools judge the degree to which programs of special assistance are helping language minority students to meet the National Education Goals. The standards have been developed by the TESOL Task Force on the Education of Language Minority Students, K-12, in the US. They are based on the most current research on language learning in academic settings.

Access to a Positive Learning Experience

1. Are the schools attended by language minority students safe, attractive, and free of prejudice?

2. Is there evidence of a positive whole-school environment whose administrative and instructional policies and practices create a climate that is characterized by high expectations as well as linguistically and culturally appropriate learning experiences for language minority students?

3. Are teachers, administrators, and other staff specifically prepared to tailor instructional and other services to the needs of language minority students?

4. Does the school environment welcome and encourage parents of language minority students as at-home primary teachers of their children and as partners in the life of the school? Does the school inform and educate parents and others concerned with the education of language minority students? Does the school systematically and regularly seek input from parents on information and decisions that affect all critical aspects of the education of language minority students, their schools and school districts?

Access to Appropriate Curriculum

5. Do language minority students have access to special instructional programs that support the second language development necessary to participate in the full range of instructional services offered to majority students?

6. Does the core curriculum designed for all students include those aspects that promote (a) the sharing, valuing, and development of both first and second languages and cultures among all students and (b) the higher order thinking skills required for learning across the curriculum?

7. Do language minority students have access to the instructional programs and related services that identify, conduct and support programs for special populations in a district? Such programs include, but are not limited to, early childhood programs, special education programs, and gifted and talented programs, as well as programs for students with handicapping conditions or disabilities, migrant education programs, programs for recent immigrants, and programs designed for students with low levels of literacy or mathematical skills, such as Chapter 1.

Access to Full Delivery Services

8. Are the teaching strategies and instructional practices used with language minority students developmentally appropriate, attuned to students' language proficiencies and cognitive levels, and culturally supportive and relevant?

9. Do students have opportunities to develop and use their first language to promote academic and social development?

10. Are non-classroom services and support services (such as counseling, career guidance, and transportation) available to language minority students?

11. Do language minority students have equal access to computers, computer classes and other technologically advanced instructional assistance?

12. Does the school have institutional policies and procedures that are linguistically and culturally sensitive to the particular needs of language minority students and their communities?

13. Does the school offer regular, nonstereotypical opportunities for native English-speaking students and language minority students to share and value one another's languages and cultures?

Access to Equitable Assessment

14. Do language minority students have access to broadly based methods of assessing language and academic achievement in the content areas that are appropriate to students' developmental level, age, and level of oral and written language proficiency in the first and second languages? Are these measures nonbiased and relevant? Are the results of such assessments explained to the community from which the student comes in the language which that community uses?

15. Do language minority students have access to broadly based methods of assessing special needs? Again, access is further defined by using measures that are nonbiased and relevant, the results of which are explained to the community from which the student comes and in the language which that community uses.

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Appendix C*: TESOL Statement on the Education of K-12 Language Minority Students in the United States*

The population of ethnolinguistically diverse students in the primary and secondary schools of the United States has grown dramatically. So dramatically, in fact, that language minority students are for the first time the majority of students in many school districts. In order for the United States to take advantage of the great cultural and linguistic diversity brought by our language minority students to the United States and its schools, we must first recognize this diversity as a national resource.

We must also recognize, however, that students come from a variety of backgrounds and circumstances. Some are immigrants, some are refugees, while others are native born Americans of different language heritages. These students enter US schools with a variety of educational experiences. Some have received extensive formal education in their home countries and are on grade level in all content areas and in reading their first language. Others have had their education delayed or interrupted and may be academically behind their peers in the U.S. and their countries of origin.

To meet the needs of such students, TESOL supports programs which promote students' growth in English language proficiency, enhance cognitive growth, facilitate academic achievement, and encourage cultural and social adjustment. Such programs include:

* Comprehensive English as a Second Language instruction for linguistically diverse students which prepares them to handle content area material in English.
* Instruction in the content areas which is academically challenging, but also is tailored to the linguistic proficiency, educational background and academic needs of students.
* Opportunities for students to further develop and/or use their first language in order to promote academic and social development.
* Professional development opportunities for both ESOL and other classroom teachers which prepare them to facilitate the language and academic growth of linguistically and culturally different children.

TESOL Statement on the Preparation of Primary and Secondary Teachers in the United States

All teachers working in K-12 education today face the challenge of responding to an increasingly diverse student population. This is especially true of those teachers who are responsible for the second language learning and academic achievement of language minority students.

Both ESOL and regular classroom teachers need special skills which prepare them to deal with language minority students in an academic setting. These skills may be learned through courses of study available through teacher preparation programs offered in colleges and universities, as well as through in-service education and professional development programs offered by school districts.

This means that teacher preparation and training programs operating at the college and university level must develop or refine presently offered programs in order to become more responsive to the needs of professionals who will be teaching language minority children in K-12 settings. Colleges and universities must structure programs of study so that ESOL teachers receive training which includes an emphasis on learning processes, child development, literacy development and methods of teaching content material to culturally and linguistically diverse students. Conversely, regular classroom teachers must participate in programs of study which include training on the nature of second language acquisition in an academic setting and language sensitive content teaching methodologies.

In-service education or staff development should be designed with two types of teachers in mind: those who work as ESOL professionals, and those who work as regular classroom teachers, but who teach language minority children. By developing ESOL-based in-service which targets the needs of both groups of teachers, teaching skills may be enhanced and/or refreshed.

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Appendix C
ENGLISH AS A SECOND LANGUAGE (ESL)
POLICY AND PROCEDURES
CHECKLIST

INTRODUCTION

   Each school district in Vermont is required to have an ESL policy and procedures to implement it. This checklist can be used by your district as a guide in reviewing an ESL policy and procedures for completeness.

GENERAL INFORMATION

1. Does your school district have a policy and procedures? _____ yes _____ no

2. How many ESL students does the school district currently have? #_____.

3. Have all of these students been formally identified and assessed? _____ yes _____ no. If not, how   many have not been assessed _____?

4. Are any of the students who have been identified as eligible for ESL services also eligible for special education or section 504 services? _____ yes _____ no. If yes, how many? _____.

IDENTIFICATION

5. Does your school district have written procedures for identifying students from a non-English language background? (NELB) _____ yes _____ no

   a) Do the procedures include use of a form for screening? _____ yes _____ no

6. Is there a process for screening of student's linguistic, academic and cultural background in order   to determine whether the student needs a formal assessment? _____ yes _____ no

ASSESSMENT

7. Does your school district have written procedures for formal assessment of the student's English proficiency to determine the kind and quantity of services to be provided? _____ yes _____ no

8. If the answer to question 7 is yes, check the boxes that apply to your school's assessment procedures:
   _____require use of accurate instruments to assess the student's oral and reading/writing skills in
       English and in the native language whenever possible.
   _____specify the instruments to be used in assessment.
   _____provide for assessment of the student's academic background and content
       knowledge/skills (e.g. informal interview, transcripts, formal tests).
   _____require identification of gifted/talented ESL students.

SERVICES

9. Do the procedures require a special language assistance program? _____ yes _____ no

10. Do the procedures require placement in a specially designed program? _____ yes _____ no

11. Is the instructional program design specified? _____ yes _____ no

12. If the answer to question 11 is yes, is the program model

_____English as a Second language
_____Bilingual Education
_____Other. Specify if known _____

13. Do the procedures require qualified personnel to teach these students (i.e. education personnel with formal training in teaching second language learners)? _____ yes _____ no

14. If the answer to question 13 is no, do the procedures require those already on staff to work towards attaining formal qualifications? _____ yes _____ no

15. Do the procedures require services to be delivered in the least segregated environment possible? _____ yes _____ no

MONITORING

16. Do the procedures specify that students should be monitored periodically to determine progress? _____ yes _____ no

17. If the answer to question 16 is yes, do the procedures include:
_____criteria for periodically assessing progress?
_____objective criteria (such as test scores that test both oral and reading/writing skills) for
    determining when a student is no longer eligible for ESL services?
_____monitoring after services have terminated to evaluate success of the student?
_____method of revising program, if necessary?